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EX PARTE OR LATE FILED

June 3, 1998

Magalie R. Salas, Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

JUN 8 - 1998

Re: **Notification of Ex Parte Presentation**
Petition of Association for Local Telecommunications Services for a
Declaratory Ruling Establishing Conditions Necessary to Promote
Deployment of Advanced Telecommunications Capability Under 706 of
the Telecommunications Act of 1996
CC Docket No. 98-78

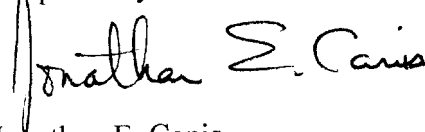
Dear Ms. Salas:

The Association for Local Telecommunications Services ("ALTS"), by its undersigned counsel, hereby submits a written ex parte filing in the above-captioned proceeding. Pursuant to Section 1.1206(b)(1) of the Commission's Rules, ALTS hereby submits an original

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and two (2) copies of this *ex parte* notification for inclusion in the public record. Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jonathan E. Canis". The signature is written in a cursive style with a large, stylized "J" and "C".

Jonathan E. Canis

cc: Lawrence E. Strickling
Carol E. Matty
Dale Hatfield
Stagg Newman
Linda Kinney
Melissa Newman
Jonathan Weinberg

ASSOCIATION FOR LOCAL TELECOMMUNICATIONS SERVICES

Written Ex Parte Filing

CC Docket No. 98-78

PROPOSED COLLOCATION REQUIREMENTS

1. Issues relating to physical collocation space use
 - a. Cageless collocation
 - already provided in Covad/U S West interconnection agreement (called "Common Collocation")
 - already offered by BellSouth (although not implemented)
 - likely to be adopted in NY, PA; maybe TX
 - requires minimum 7½ square feet (3 sq. ft. for rack footprint + 2½ times for ventilation and access)
 - b. Enclosed collocation spaces of less than 100 sq. ft., starting with increments of as little as 10 sq. ft.
 - other alternatives to building cages include locker-type enclosed equipment racks
2. Allow multiple CLECs to share same collocation cage
 - in such arrangement, each CLEC must have right to order UNEs to be deployed to the cage
 - requiring a single CLEC to be the customer of record for all UNEs ordered to the cage is an unacceptable restriction
3. Permit CLEC-installed cross-connection between collocated CLECs
4. Eliminate all restrictions on equipment that may be collocated
 - voice and data switches, internet routers, remote switching modules
 - establishing collocation rules under §251(c)(6) will ensure that only telecom carriers have access to these expanded collocation rights
 - addresses FCC's previously-stated concerns that call aggregators, information service providers, alarm monitoring companies, etc. would exhaust available collocation space
5. Eliminate ILEC restrictions on the use of collocation arrangements taken out of a federal tariff to connect with services taken out of state tariffs or with UNEs taken out of state arbitration proceedings

6. Walk-throughs and third-party independent verification of ILEC claims of space exhaustion
 - system proposed in Bell Atlantic profiling statement in New York
 - confirm that ILECs are using their central office space efficiently by promptly removing equipment, cabling, etc. that is no longer in use
 - ALTS supports provisions that require efficient use of collocated space by collocated carriers
7. Virtual collocation must be available as means of connecting UNEs
 - currently, all ILECs are refusing to allow virtual as a means of connecting UNEs, claiming it violates 8th Circuit decision
 - BellSouth offers "option" of virtually collocating a pre-wired cross-connect frame
 - BellSouth claims this is consistent with 8th Circuit because the prewired frame will actually do the combining of loop and interoffice transport elements
 - completely unacceptable alternative
8. Virtual collocation at points of aggregation along loop
 - controlled environmental vault or above-ground equivalent
 - other points of aggregation where DLCs, MUXs, OLTMs, DSLs are deployed
 - would allow CLEC to identify the type of equipment installed in point of aggregation
 - line cards to be installed in aggregating equipment
 - aggregating equipment to be cross-connected to distribution or feeder plant
9. All virtual and physical collocation rates and charges must reflect costing principles of Section 252 of Act
10. Establish timely deployment intervals of 30 days for virtual and cageless arrangements
11. Have process for modifying federal collocation rules to incorporate best practices of state PUCs
12. Reject ILEC arguments that have the effect of restricting collocation:
 - that digital equipment and data services (such as frame relay) are not subject to interconnection, collocation, unbundling, and resale provisions of the Act
 - that ILECs are not obligated to provide a UNE unless a State PUC has ordered it through an arbitration order
 - that an ILEC does not have to provide an unbundled loop with a functionality that it provides as a tariffed service (i.e., SBC's argument that it does not need to provide

PROPOSED UNBUNDLED NETWORK ELEMENTS

1. Establish the following categories of loops:
 - 2-wire analog
 - 4-wire analog
 - 2-wire digital
 - 4-wire digital
 - loops provided with electronics, priced at rates that reflect cost of electronics
 - digital loop carrier (universal, integrated, next generation)
 - multiplexer
 - optical line terminating multiplexer or other optical-electrical converter
 - digital subscriber line (asynchronous, synchronous, high bit-rate, etc.), including remote DSLAMs, DSL line cards used in ISDN or DLC equipment, etc.
2. Subloop electronics
 - DSL, DLC, ISDN, MUX, OLTM, etc.
3. All UNE rates and charges must reflect costing principles of Section 272 of Act
4. Loop conditioning involves one-time, up front labor, which must be priced on a nonrecurring basis
5. Access to preordering systems that identify DSL-capable and other digital-ready loops
6. Have process for modifying federal collocation rules to incorporate best practices of state PUCs